IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE COLUMBIA DIVISION

REBECCA YOUNG,)	
)	
Plaintiff,)	
)	No.: 1:15-cv-00107
v.)	CHIEF JUDGE SHARP
)	JURY DEMAND
GILES COUNTY BOARD OF)	
EDUCATION, PHILLIP J. WRIGHT)	
In his individual and official capacity)	
As Director of Schools for Giles County,)	
Tennessee, and MICAH LANDERS, in)	
His individual and official capacity as)	
Principal of Richland High School,)	
,)	
Defendants.)	
	-	

DECLARATION OF PHILLIP J. WRIGHT

- I, Phillip J. Wright, based upon my personal knowledge state as follows:
- 1. I am the Director of Schools for Giles County School District in Giles County, Tennessee and I am over the age of 18 years. I have personal knowledge of the facts stated herein, and I am competent to testify about those facts.
- 2. I have launched an investigation into the school district concerning incidents of bullying based on sexual preference within the Giles County School System.
- 3. In addition to the issues which have plagued Miss Rebecca Young, there have been other incidents at other schools in which students have been bullied based on their sexual preference.
- 4. At this time, I have received two additional complaints of bullying at Bridgeforth Middle School. One such incident occurred in September 2014 in which two female students were being bullied by a male student. Said male student was spreading

rumors about the two young ladies and was calling them lesbians and asking them what they did with one another as part of their relationship. Another incident occurred at Bridgeforth Middle School in October 2015. In that incident, two male students were bullying a female student. The males engaged in gossiping about the female student and called her a lesbian. This resulted in a disruption to the class which led to the entire class becoming punished due to the disruptive atmosphere. A true and exacted redacted copy of the Bullying Behavior Report Forms surrounding these incidents is attached as Collective Exhibit A.¹

¹ The names of the students involved have been redacted from the Exhibits in order to protect their anonymity.

I certify under penalty of perjury under the laws of the United States of America and the State of Tennessee that the foregoing is true and accurate.

Executed on February _______, 2016.

Philp J Wright

Phillip J. Wright

Respectfully submitted,

/s/Robyn Beale Williams

Robyn Beale Williams, BPR #19736

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Counsel for Giles County Board of Education, Phillip J. Wright, in his individual and official capacity as Director of Schools for Giles County, Tennessee, and Micah Landers, in his individual and official capacity as Principal of Richland High School

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of February 2016, a true and correct copy of the foregoing has been forwarded via the U.S. District Court's electronic notification system to:

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/s/ Robyn Beale Williams

Robyn Beale Williams